



Rachel Maimin
Partner

1251 Avenue of the Americas
New York, New York 10020

T: (212) 419-5876
F: (973) 597-2400
E: rmaimin@lowenstein.com

September 26, 2023

BY ECF

The Honorable Gregory H. Woods
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Stanley Kaplan, 23 Cr. 320 (GHW)

Dear Judge Woods:

We respectfully submit this letter on behalf of our client in the above-referenced case, the defendant Stanley Kaplan, to request two modifications of his bail conditions: (1) to allow him to travel when necessary to attend disciplinary hearings in the states where he maintains a license to practice medicine; and (2) to permit him to travel to Rhode Island to visit with family. The states where Dr. Kaplan is licensed to practice medicine are listed in **Appendix A**. The Government has deferred to the Pretrial Services Office on both requests, and Pretrial Services has consented to both on the condition that Dr. Kaplan give advance notice of any travel and provide verification of the hearings. Accordingly, on those conditions, we request that Dr. Kaplan's bail conditions be modified as described above.

Respectfully submitted,

A handwritten signature in blue ink that reads 'Rachel Maimin'.

Rachel Maimin

Appendix A

1. Florida
2. Louisiana
3. South Carolina
4. Tennessee
5. Mississippi
6. Missouri
7. Pennsylvania
8. New York (Albany)
9. Virginia
10. Wisconsin
11. Nevada
12. Oklahoma
13. Texas